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May 25, 2005

Public Service Commission of South Carolina  
Attn: Docketing Department  
Post Office Box 11649  
Columbia, South Carolina 29211

Re: Application of nii communications, Ltd. d/b/a nii communications, L.P. for a  
Certificate of Public Convenience and Necessity to Provide Local Exchange  
Telecommunications Services, Access Services and Resold Interexchange  
Telecommunications Services within the State of South Carolina (SCPSC  
Docket No. ~~2004~~-88-C)

2005 88-C

Dear Sir or Madam:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,

*Margaret M. Fox*

Margaret M. Fox

Enclosures

cc: Robert D. Coble, Esquire  
Florence P. Belser, Esquire

OK DBM  
OK DBM

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2005-88-C

FILED  
2005-11-15  
CLERK OF COURT  
SOUTH CAROLINA

Re: Application of nii communications, Ltd. d/b/a )  
nii communications, L.P. for a Certificate of )  
Public Convenience and Necessity to Provide )  
Resold and Facilities-based Local Exchange )  
Telecommunications Services, Access Services )  
and Resold Interexchange Telecommunications )  
Services within the State of South Carolina )  
\_\_\_\_\_ )

**PETITION TO  
INTERVENE**

In response to the Commission's Notice of the Filing of the Application of nii communications, Ltd. d/b/a nii communications, L.P. for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

May 25, 2005

Columbia, South Carolina

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2005-88-C

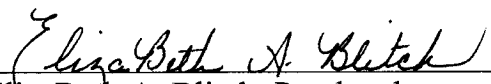
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Services within the State of South Carolina )  
\_\_\_\_\_ )

**CERTIFICATE OF  
SERVICE**

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier  
1441 Main Street, Suite 1500  
Columbia, South Carolina 29201

Florence P. Belser, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, South Carolina 29211.

  
ElizaBeth A. Blitch, Paralegal  
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(803) 799-9800

May 25, 2005  
Columbia, South Carolina